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May 22, 2025

Via ECF:
The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: ***Morales et al v. The Riverdale Management Group LTD. et al.***
Civil Docket No.: 1:24-cv-04474-KPF

Dear Judge Failla:

We represent the Plaintiff in the above-referenced matter and we submit this motion, on consent of counsel for the Defendants, to respectfully request an extension to file the parties' proposed settlement agreement and motion for settlement approval pursuant to *Wolinsky v. Scholastic, Inc., 900 F. Supp. 2d 332, 335-336*, and pursuant to the Court's April 30, 2025 Order. The motion for settlement approval is currently due May 30, 2025.

Although drafts of the documents have been circulated, the parties are still in the process of finalizing the settlement documents and obtaining signatures. Additionally, the undersigned will be out of the office next week and, as such, we anticipate needing a brief extension to finalize and file the settlement documents. Therefore, we respectfully request that the time to file be extended two weeks from May 30, 2025 to June 13, 2025. This is the first request for an extension of time of this deadline and this request will not affect any other dates or deadlines.

We thank the Court for its consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

James O'Donnell
James O'Donnell, Esq.

CC: via ecf

Counsel for all Defendants

Application GRANTED. The parties' deadline to file their completed settlement agreement along with a joint letter regarding the fairness of the settlement agreement is hereby ADJOURNED to **June 13, 2025.**

Dated: May 23, 2025   SO ORDERED.
           New York, New York

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE